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SOAH CONSOLIDATED DOCKET NO. 473-19-1265  
PUC CONSOLIDATED DOCKET NO. 48785

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JOINT APPLICATION OF ONCOR  
ELECTRIC DELIVERY COMPANY  
LLC, AEP TEXAS INC., AND LCRA  
TRANSMISSION SERVICES  
CORPORATION TO AMEND THEIR  
CERTIFICATES OF CONVENIENCE  
AND NECESSITY FOR 345-KV  
TRANSMISSION LINES IN PECOS,  
REEVES, AND WARD COUNTIES,  
TEXAS (SAND LAKE TO SOLSTICE  
AND BAKERSFIELD TO SOLSTICE

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BEFORE THE STATE OFFICE

UTILITY COMMISSION  
FILING CLERK

OF

ADMINISTRATIVE HEARINGS

**CITY OF GARLAND'S MOTION TO INTERVENE**

The City of Garland, whose municipally owned electric utility operates under the name of Garland Power & Light ("Garland") files this Motion to Intervene in the above-referenced proceeding pursuant to 16 Tex. Admin. Code §§ 22.103 and 22.104, and in support thereof, respectfully shows the following:

**I. APPLICATION**

On November 7, 2018, Oncor Electric Delivery Company LLC (Oncor), AEP Texas Inc. (AEP Texas), and LCRA Transmission Services Corporation (LCRA TSC) (collectively the Applicants) filed joint applications in the above dockets to amend their certificates of convenience and necessity (CCNs). AEP Texas and LCRA TSC propose to amend their CCNs for the proposed Bakersfield to Solstice 345-kV transmission line project (the Project). The Project consists of a 345-kV double-circuit transmission line with an initial single circuit installed from Bakersfield to AEP Texas's Solstice Switch station. The LCRA TSC Bakersfield Switch station is located approximately six miles north of interstate highway 10 and one mile west of farm-to-market road 1901.

**II. JUSTICIABLE INTEREST**

Garland is a municipally owned electric utility that operates both transmission and distribution facilities. Garland will be affected by the outcome of this proceeding and has a

justiciable interest in the approvals that the Applicants seek. Garland owns and operates transmission assets within the Study Area, including a transmission line that ends at the Bakersfield Switch station, which is a proposed endpoint for the Project. The proposed transmission line has the ability to affect Garland's assets and its operations. Consequently, Garland has a justiciable interest in this matter. No other entity can adequately represent Garland's interests.

### **III. DESIGNATION OF REPRESENTATIVES**

The address and telephone number of Garland's authorized legal representative is:

Lambeth Townsend  
William A. "Cody" Faulk, III  
Lloyd Gosselink Rochelle & Townsend, P.C.  
816 Congress Ave., Suite 1900  
Austin, Texas 78701  
Telephone: (512) 322-5800  
Facsimile: (512) 472-0532  
[ltownsend@lglawfirm.com](mailto:ltownsend@lglawfirm.com)  
[wfaulk@lglawfirm.com](mailto:wfaulk@lglawfirm.com)

### **IV. CORRESPONDENCE**

Garland requests that all correspondence, pleadings, briefs, requests for information, responses to requests for information, and other documents in this proceeding be served upon Garland's authorized representative.

### **V. PRAYER**

Garland respectfully asserts that it has a justiciable interest in this proceeding and prays that its Motion to Intervene be granted and that it be afforded full party status in this matter.

BRAD NEIGHBOR  
State Bar No. 14869300  
City Attorney  
CITY OF GARLAND  
200 North 5th Street, Suite 416  
Garland, Texas 75040  
Telephone: (972) 205-2380  
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ATTORNEYS FOR THE  
CITY OF GARLAND

Respectfully submitted,

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WILLIAM A. FAULK, III

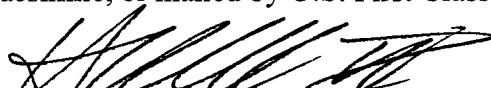
State Bar No. 24075674

E-Mail: [cfaulk@lglawfirm.com](mailto:cfaulk@lglawfirm.com)

ATTORNEYS FOR THE CITY OF GARLAND

### **CERTIFICATE OF SERVICE**

I, William A. Faulk, III, attorney, certify that a copy of this document was served on all parties of record in this proceeding on this 21<sup>st</sup> day of November, 2018, in the following manner: hand delivered, emailed, sent via facsimile, or mailed by U.S. First Class Mail.

  
WILLIAM "CODY" FAULK, III